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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2013-814

13 **JAIME LYNNE LANGELIER, AKA**
14 **JAIME LYNNE VALENZANO**
2838 San Miguel Drive
Lancaster, CA 93535

A C C U S A T I O N

15 **Registered Nurse License No. 766225**

16 Respondent.

17
18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., R.N. (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
22 Consumer Affairs.

23 2. On or about January 28, 2010, the Board of Registered Nursing issued Registered
24 Nurse License Number 766225 to Jaime Lynne Langelier, aka Jaime Lynne Valenzano
25 (Respondent). The Registered Nurse License was in full force and effect at all times relevant to
26 the charges brought herein and will expire on June 30, 2013, unless renewed.

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1 9. Fluoxetine HCL (Prozac) is a selective serotonin reuptake inhibitor and is categorized
2 as a dangerous drug pursuant to section 4022 of the Code. It is used to treat depression.

3 10. Losartan (Cozaar) is an angiotensin II receptor antagonist. It is categorized as a
4 dangerous drug pursuant to Business and Professions Code section 4022 and is used to treat high
5 blood pressure (hypertension).

6 11. Divalproex TBEC (Depakote) is categorized as a dangerous drug pursuant to
7 Business and Professions Code section 4022. It is used to treat seizure disorders.

8 12. Levetiracetam (Keppra) is categorized as a dangerous drug pursuant to Business and
9 Professions Code section 4022. It is used to treat seizure disorders.

10 FACTUAL SUMMARY

11 13. On or about May 22, 2010, patient GL, an 83-year-old female, was admitted to the
12 intensive care unit of Antelope Valley Hospital, Lancaster, California (AVH), with a diagnosis of
13 chronic obstructive pulmonary disease, congestive heart failure, clostridium difficile colitis,
14 pneumonia and renal failure. Patient GL was kept in the intensive care unit for three days. On or
15 about May 25, 2010, patient GL was transferred to the telemetry unit because her condition had
16 improved.

17 14. On May 25, 2010, AVH's pharmacy mistakenly inputted medications that had not
18 been ordered into patient GL's Medication Administration Record (MAR), specifically,
19 Methadone, Fluoxetine (Prozac), Losartan (Cozaar), Divalproex TBEC (Depakote) and
20 Levetiracetam (Keppra). MARs are issued by the pharmacy in the evening to be used by the
21 hospital's nurses to care for their patients the next day.

22 15. It is the policy of AVH that the night shift nurse assigned to a patient is required to
23 verify the new Medication Administration Record (MAR) for that patient to prevent medication
24 errors. On May 25, 2010, the night nurse failed to verify/correct the new MAR for patient GL.

25 16. In the morning of May 26, 2010, while on duty as a registered nurse in AVH's
26 telemetry unit during the day shift (0700 to 1900 hours), Respondent administered to patient GL
27 the medications that were erroneously listed on the MAR that were left uncorrected/unverified by
28 the night nurse, except that she did not administer the Methadone. Respondent did not reconcile

1 the list of medications ordered by the physician to the MAR before administering the medication
2 listed on the MAR to the patient. She did not confirm the rationale for the medication on the
3 MAR by checking the patient's medical history, the reason she was taking each medication, and
4 the possible side effects of each medication prior to administration.

5 17. After Respondent administered the wrong medications to patient GL, her condition
6 deteriorated, and she was transferred back to the ICU, where she was declared brain dead and
7 died on May 28, 2010, at 1300.

8 **CAUSE FOR DISCIPLINE**

9 **(Unprofessional Conduct)**

10 18. Respondent is subject to disciplinary action under section 2761, subdivision (a), in
11 that while on duty as a registered nurse at AVH, Respondent committed unprofessional conduct
12 by failing to verify that the medication on the patient's MAR was ordered by a physician and that
13 the medication was indicated for the patient's condition prior to administering the medication.
14 Complainant refers to and by this reference incorporates the allegations set forth above in
15 paragraphs 13 through 17, as though set forth fully.

16 **PRAYER**

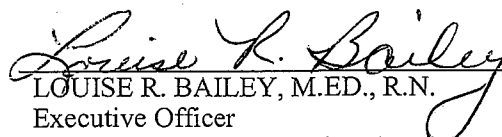
17 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
18 and that following the hearing, the Board of Registered Nursing issue a decision:

19 1. Revoking or suspending Registered Nurse License Number 766225, issued to Jaime
20 Lynne Langelier, aka Jaime Lynne Valenzano;

21 2. Ordering Jaime Lynne Langelier to pay the Board the reasonable costs of the
22 investigation and enforcement of this case, pursuant to Business and Professions Code section
23 125.3; and,

24 3. Taking such other and further action as deemed necessary and proper.

25 DATED: March 21, 2013

26 
27 LOUISE R. BAILEY, M.ED., R.N.
28 Executive Officer
Board of Registered Nursing, Special Investigator
State of California
Complainant